

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

United States of America	*	
Plaintiff,	*	Civil Action No.: 1:24-cv-1345 (MAD/DJS)
v.	*	
One 2003 Ferrari Enzo AB Version E, VIN: ZFFCZ56B000132659, <i>et al.</i>	*	
	*	
Defendants.	*	
	*	

* * * * *

ANSWER

Claimant, J.K. Technologies, LLC (“J.K.”), by its undersigned attorneys, pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture, files this Answer to Verified Complaint for Forfeiture *In Rem* and, in support thereof, states:

NATURE OF THE ACTION

On or about November 5, 2024, Plaintiff filed a Verified Complaint for Forfeiture *In Rem* pursuant to which Plaintiff seeks to take legal ownership of various assets as proceeds of offenses in violation of Title 18, United States Code, Sections 1343 and 1349, among others. Claimant has a statutory lien on two (2) of the assets: **one 2003 Ferrari Enzo AB Version E, VIN ZFFCZ56B000132659** and **one 2014 Ferrari LaFerrari, VIN ZFF76ZHB000203166**. Claimant previously submitted a Verified Claim pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture.

FORFEITURE AUTHORITY

Claimant has no knowledge or information relating to the underlying claimed offenses and, accordingly, lacks knowledge or information sufficient to form a belief as to whether Plaintiff has the requisite authority under federal law to seize the property.

RESPONSES TO INDIVIDUALLY NUMBERED PARAGRAPHS

1. Admitted.
2. Claimant admits that Plaintiff seized the property identified in subparagraphs 1 and 2 – one 2003 Ferrari Enzo AB Version E, VIN ZFFCZ56B000132659 and one 2014 Ferrari LaFerrari, VIN ZFF76ZHB000203166. Claimant has no knowledge or information upon which to form a belief as to the remaining property listed in paragraph 2 of the Verified Complaint.
3. Admitted.
4. Admitted as to property identified in paragraph 2, subparagraphs 1 and 2. Claimant has no knowledge regarding whether the remaining Defendant Properties are presently in Plaintiff's custody.
5. Admitted.
6. Admitted.
7. Admitted.
8. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraph 8 of the Verified Complaint.
9. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraph 9 of the Verified Complaint.
10. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraph 10 of the Verified Complaint.

11. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraphs 11-21 of the Verified Complaint.

12. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraphs 22-69 of the Verified Complaint.

13. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraphs 70-76 of the Verified Complaint.

14. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraphs 77-85 of the Verified Complaint.

15. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraph 86 of the Verified Complaint.

16. Claimant is aware, as alleged in paragraph 87 of the Verified Complaint, that Prime Capital purchased the 2003 Ferrari Enzo and 2014 Ferrari LaFerrari from RM Sotheby's in November 2022. Claimant lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations set forth in paragraph 87 of the Verified Complaint.

17. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraphs 88-152 of the Verified Complaint.

18. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations set forth in paragraph 153 of the Verified Complaint.

AFFIRMATIVE DEFENSE

1. Claimant has a statutory lien on the Ferrari Enzo and Ferrari LaFerrari pursuant to Maryland Commercial Law Article § 16-202(c).

2. Plaintiff has failed to state a claim upon which relief may be granted.



P. John Veysey (Fed. Bar No. 520145)
NELSON MULLINS RILEY & SCARBOROUGH LLP
One Financial Center, Suite 3500
Boston, MA 02111
Phone: (617) 217-4645
Fax: (617) 217-4710
john.veysey@nelsonmullins.com

Attorneys for Claimant, J.K. Technologies, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of January 2025, a copy of the Answer was served on all counsel of record *via* the court's electronic filing system and a courtesy copy was sent, *via* first class mail, postage prepaid, to the following:

Carla B. Freedman, United States Attorney
United States Attorney's Office, Northern District of New York
100 South Clinton Street
Syracuse, New York 13261
ATTN: Elizabeth A. Conger, Assistant U.S. Attorney



P. John Veysey (Fed. Bar No. 520145)